

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	
)	Chapter 11
JOANN INC., <i>et al.</i> , ¹)	Case No. 25-10068 (CTG)
)	
Debtors.)	(Jointly Administered)
)	
)	Re: Docket Nos. 760 & 930

**CERTIFICATION OF COUNSEL REGARDING AMENDED FIRST
NOTICE OF ASSUMPTION AND ASSIGNMENT OF CERTAIN
EXECUTORY CONTRACTS AND/OR UNEXPIRED LEASES**

The undersigned counsel to JOANN Inc. and certain of its affiliates, the debtors and debtors in possession in the above-captioned cases (collectively, the “Debtors”), hereby certifies as follows:

1. On April 28, 2025, the Debtors filed the *First Notice of Assumption and Assignment of Certain Executory Contract and/or Unexpired Leases* [Docket No. 760] (the “First Assumption Notice”) regarding the assumption and assignment of the unexpired leases set forth on Schedule 2 to the First Assumption Notice (the “Original Assumption List”). Attached as Schedule 3 to the First Assumption Notice was a proposed form of order approving the assumption and assignment of the unexpired leases on the Original Assumption List (the “Original Proposed Order”). The deadline to object to the First Assumption Notice was May 12, 2025.

2. On May 16, 2025, the Debtors filed the *Amended First Notice of Assumption and Assignment of Certain Executory Contracts and/or Unexpired Leases* [Docket No. 930] (the

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors’ mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

“Amended First Assumption Notice”). Attached as Schedule 2 to the Amended First Assumption Notice was a revised schedule of unexpired leases (the “Revised Assumption List”). Attached as Schedule 3 to the Amended First Assumption Notice was a proposed form of order (the “Burlington Assumption Order”) authorizing the assumption and assignment of the unexpired leases on the Revised Assumption List to Burlington Coat Factory Warehouse Corporation and Burlington Coat Factory of Texas, Inc. (together, “Burlington”) pursuant to the terms of that certain *Assumption and Assignment Agreement* between and among GA Joann Retail Partnership, LLC as agent for the Debtors (the “Agent”) and Burlington, substantially in the form attached to the Burlington Assumption Order as Exhibit B (the “Assumption and Assignment Agreement”). The deadline to object to the Amended First Assumption Notice was May 30, 2025 (the “Objection Deadline”).

3. Prior to the Objection Deadline, the Debtors received informal comments from the landlords of Store Nos. 2446, 2155, 2071, 1867 regarding the proposed cure amounts listed in the Amended First Assumption Notice, and several objections to the Amended First Assumption Notice were filed on the docket. *See* Docket Nos. 995, 1016, 1025, 1046, 1047, 1055.

4. Attached as **Exhibit A** is a revised Burlington Assumption Order (the “Revised Burlington Assumption Order”), which resolves the informal comments received from the landlords of Store Nos. 2446, 2155, 2071 and 1867. The filed objections and informal comments received regarding the remaining balance of the leases included in the Amended First Assumption Notice (collectively, the “Outstanding Leases”) have not been resolved and are therefore not included in the Revised Burlington Assumption Order.

5. For the avoidance of doubt, the Amended First Assumption Notice remains pending, and has not been withdrawn, with respect to the Outstanding Leases. To the extent that

the Debtors and the objecting landlords reach agreement with respect to any Outstanding Lease, the Debtors will submit a proposed form of order with respect to such lease.

6. Accordingly, the Debtors request entry of the Revised Burlington Proposed Order attached hereto as **Exhibit A** at the Court's earliest convenience.

Dated: June 5, 2025
Wilmington, Delaware

/s/ Jack M. Dougherty

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